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14 **UNITED STATES DISTRICT COURT**

15 **NORTHERN DISTRICT OF CALIFORNIA**

16 **SAN FRANCISCO DIVISION**

17 IN RE: UBER TECHNOLOGIES, INC.,
 18 PASSENGER SEXUAL ASSAULT
 19 LITIGATION

20 Case No. 3:23-md-03084-CRB

21 **DECLARATION OF STEVEN S.
 22 SCHULTE IN SUPPORT OF
 23 NACHAWATI LAW GROUP
 24 PLAINTIFFS' OPPOSITION TO
 25 DEFENDANTS UBER TECHNOLOGIES,
 26 INC., RASIER, LLC, AND RASIER-CA,
 27 LLC'S MOTION TO DISMISS CASES
 28 FOR FAILURE TO COMPLY WITH
 29 AMENDED PTO 10**

30 This Document Relates to:

31 *Jane Doe NLG (A.D.) v. Uber Technologies, Inc.,*
 32 *et al., No. 3:25-cv-07407-CRB*
 33
 34 *Jane Doe NLG (A.H.) v. Uber Technologies, Inc.,*
 35 *et al., No. 3:25-cv-07400-CRB*
 36
 37 *Jane Doe NLG (D.L.) v. Uber Technologies, Inc.,*
 38 *et al., No. 3:25-cv-07478-CRB*
 39
 40 *Jane Doe NLG (J.D.) v. Uber Technologies, Inc.,*
 41 *et al., No. 3:25-cv-07482-CRB*
 42
 43 *Jane Doe NLG (J.L.) v. Uber Technologies, Inc.,*
 44 *et al., No. 3:25-cv-07545-CRB*
 45
 46 *Jane Doe NLG (L.F.) v. Uber Technologies, Inc.,*
 47 *et al., No. 3:25-cv-07542-CRB*

48
 49 Judge: Honorable Charles R. Breyer
 50 Date: January 16, 2026
 51 Time: 10:00 a.m.
 52 Courtroom: 6 – 17th Floor

Jane Doe NLG (L.R.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07423-CRB

Jane Doe NLG (N.T.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07540-CRB

Jane Doe NLG (R.H.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07403-CRB

Jane Doe NLG (S.M.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07543-CRB

Jane Doe NLG (T.P.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07484-CRB

Jane Doe NLG (V.M.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07467-CRB

Jane Doe NLG (M.P.) v. Uber Technologies, Inc., et al., No. 3:25-cv-07312-CRB

DECLARATION OF STEVEN S. SCHULTE

I, Steven S. Schulte, declare as follows:

1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a partner at the law firm Nachawati Law Group and counsel of record for the plaintiffs represented by Nachawati Law Group whose claims are the subject of Defendants' Motion to Dismiss. ECF No. 4491.
2. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.
3. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with Amended Pretrial Order 10 ("PTO 10").

4. Despite significant efforts, including numerous phone calls, emails, texts, letters, written communications, and full contact and address searches, our office has been unsuccessful in connecting with certain Plaintiffs as to the verified Plaintiff Fact Sheets that are the subject of Defendants' Motion.

5. Plaintiffs Jane Doe NLG (A.H.), Jane Doe NLG (D.L.), Jane Doe NLG (L.R.), Jane Doe NLG (S.M.), and Jane Doe NLG (M.P.) have submitted and produced verified Plaintiff Fact Sheets as required by Amended Pretrial Order No. 10, as of December 10, 2025. Counsel would therefore dispute their inclusion on Uber's list of delinquencies, provided in their Motion, as well as respectfully request for their exclusion on any future entry of dismissal by the Court.

Executed on December 10, 2025, in Dallas, Texas.

NACHAWATI LAW GROUP

/s/ Steven S. Schulte
Steven S. Schulte (TX SBN 24051306)